

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**IN RE:** ) **Chapter 13**  
JOSE E. SOTO and )  
MARVELLA ENRIQUEZ ) **Case No. 22-08017**  
Debtors. )  
 ) **Judge Jacqueline P. Cox**

## **NOTICE OF MOTION**

TO: Office of Thomas H. Hooper  
Chapter 13 Trustee  
*via ECF clerk's electronic delivery system*

PLEASE TAKE NOTICE that on August 15, 2022 at 9:00 a.m., the undersigned shall appear by telephone before the Honorable Judge Jacqueline P. Cox or any Judge sitting in her stead and then and there present the Motion to Extend Time to File Remaining Schedules, Plan and other documents, a copy of which is attached hereto.

**This motion will be presented and heard electronically using Zoom for Government.**

**To appear by video,** (1) use this link: <https://www.zoomgov.com/>. (2) Enter the meeting ID 1612732896. (3) Enter the passcode 778135.

**To appear by telephone,** (1) call Zoom for Government at 1-669-254-5252 or 1-646- 828-7666.  
(2) Enter the meeting ID 1612732896. (3) Enter passcode 778135.

**When prompted identify yourself by stating your full name.**

**To reach Judge Cox's web page** go to [www.ilnb.uscourts.gov](http://www.ilnb.uscourts.gov) and click on the tab for Judges.

**If you object to this motion** and want it called on the presentment date above, you may file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may call the matter regardless.

/s/ David H. Cutler

## CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies that he caused the above and foregoing Notice and attached Motion to be served on the Trustee via Electronic Court Notice on August 2, 2022 before 5:00 p.m.

/s/ David H. Cutler

Cutler & Associates, Ltd  
4131 Main St.  
Skokie, IL 60076  
Phone: (847) 673-8600

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**IN RE:** )      **Chapter 13**  
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**Debtors.**      )      **Judge Jacqueline P. Cox**

**MOTION TO EXTEND TIME TO FILE DEBTORS  
REMAINING SCHEDULES, PLAN AND OTHER DOCUMENTS**

NOW COMES the Debtors, Jose E. Soto and Marvella Enriquez, by and through their attorneys, Cutler & Associates, Ltd., and move this Court to grant them until August 15, 2022 to file their remaining Schedules, Plan and other documents. In support of this Motion, the Debtors respectfully state and allege as follows:

1.      The Debtors filed their petition for relief under Chapter 13 of the United States Bankruptcy Code on July 19, 2022.
2.      The Debtors remaining schedules, plan and other documents would, in absence of this motion be due on August 2, 2022.
3.      The Debtors need additional time to review the remaining schedules, plan and other documents with their attorney before they can be filed.
4.      The Debtors, therefore, requests that they be granted until August 15, 2022 to file their remaining Schedules, Plan and other documents.

WHEREFORE, the Debtors, Jose E. Soto and Marvella Enriquez, pray for the following relief:

- A.      That the Debtors be granted until August 15, 2022 to file their remaining schedules, plan and other documents; and
- B.      For such other and further relief as this Court deems equitable and just.

Respectfully Submitted,

Dated: August 2, 2022

By: \_\_\_\_\_ /s/ David H. Cutler  
One of the attorneys for the Debtor

Cutler & Associates, Ltd.  
4131 Main St.  
Skokie, IL 60076  
Phone: (847) 673-8600